

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA
1333 H STREET, N.W., SUITE 200, WEST TOWER
WASHINGTON, DC 20005

ORDER

January 6, 2003

FORMAL CASE NO. 962, IN THE MATTER OF THE IMPLEMENTATION OF THE DISTRICT OF COLUMBIA TELECOMMUNICATIONS COMPETITION ACT OF 1996 AND IMPLEMENTATION OF THE TELECOMMUNICATIONS ACT OF 1996; FORMAL CASE NO. 1011 - IN THE MATTER OF VERIZON WASHINGTON DC, INC.'S COMPLIANCE WITH THE CONDITIONS ESTABLISHED IN SECTION 271 OF THE FEDERAL TELECOMMUNICATIONS ACT OF 1996, Order No. 12626

I. INTRODUCTION

1. By this Order, the Public Service Commission of the District of Columbia ("Commission") declares that the only unbundled network element ("**UNE**") rates Verizon Washington DC, Inc. ("Verizon DC") is authorized to use are those set forth in Commission Order No. 12610.¹ Because Verizon DC has filed a petition for reconsideration of Order No. 12610,² implementation of the rates in Order No. 12610 will be stayed and the applicable rates will be those in effect prior to the issuance of that Order. In no event is Verizon DC authorized to use rates established in New York, benchmarked or otherwise.

II. DISCUSSION

2. On December 6, 2002, the Commission released Order No. 12610, establishing **UNE** and resale discount rates for the District of Columbia. Shortly thereafter, on December 19, 2002, Verizon DC filed its Section 271 application for the District of Columbia, Maryland, and West Virginia with the Federal Communications Commission ("FCC"). In that application, Verizon DC states:

[t]he District of Columbia **PSC** has recently completed a pricing proceeding in which it adopted **UNE** rates that are substantially below the range that a reasonable application of **TELRIC** principles would produce. Verizon accordingly intends to petition

¹ *Formal Case No. 962, In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996* ("F.C. 962"), Order No. 12610, rel. December 6, 2002.

² *Formal Case No. 962, In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996*, Verizon Washington DC, Inc.'s Application for Partial Reconsideration and Clarification of Order No. 12610 ("Verizon DC Reconsideration"), filed January 3, 2003.

the PSC to reconsider its decision. Pursuant to District of Columbia law, Verizon's petition will trigger a stay of the new rates until the PSC issues a final determination on the petition. While the rates are stayed, Verizon will offer UNE rates in the District that are the lower of the previous rates in effect in the District prior to the PSC's recent decision, or the comparable rates recently adopted in New York, adjusted where possible to account for cost differences between DC and New York. This approach **is** consistent with Commission precedent and ensures that the rates in effect in the District will be within (or below) the TELRIC range?

3. The majority views this filing as a clear statement of Verizon DC's intent to use New York rates in some circumstances even though the Commission has not approved them. **Our** colleague apparently reads Verizon DC's filing differently and is **of** the opinion that it is merely an expression of the company's desire to use the New York rates, not an intent to implement them. Verizon DC subsequently filed a letter with this Commission stating its intent to seek reconsideration of Order No. 12610 and, during the pendency of that appeal, to implement interim UNE rates set at "either the levels in effect prior to December **6, 2002** or at levels benchmarked to **the** TELRIC-compliant rates **in** New York - whichever is **lower**."⁴

4. Contrary to our colleague's opinion, there is nothing remotely speculative about Verizon DC's intentions or the basis for this Order. Verizon DC has made statements before both the FCC and the Commission that express its unequivocal intent to implement New York rates, as it deems appropriate, and there is nothing in either statement that conditions the company's use of those rates on our approval. Under these circumstances, we cannot simply sit mum, as Commissioner Rachal, suggests and, by our silence, inadvertently give the impression that we condone Verizon DC's actions.

³ *In the Matter of Application of Verizon Maryland, Inc., Verizon Washington DC, Inc., and Verizon West Virginia, Inc., et al. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Maryland, Washington, D.C., and West Virginia*, Verizon Brief at 41.

⁴ *Formal Case No. 962, In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996; Formal Case No. 1011 - In the Matter of Verizon Washington DC, Inc.'s Compliance with the Conditions Established in Section 271 of the Federal Telecommunications Act of 1996*, Letter from Marie C. Johns, President, Verizon Washington, DC Inc., to Commissioners Angel M. Cartagena, Jr., Agnes Alexander Yates, and Anthony A. Rachal, filed December 26, 2002. AT&T Communications of Washington D.C., L.L.C. ("AT&T") subsequently filed a letter opposing Verizon DC's statements with this Commission. See, *Formal Case No. 962, In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996; Formal Case No. 1011 - In the Matter of Verizon Washington DC, Inc.'s Compliance with the Conditions Established in Section 271 of the Federal Telecommunications Act of 1996*, Letter to Sanford M. Speight, Acting Commission Secretary from Mark Keffer, Vice President, Law and Government Affairs, AT&T, filed January 2, 2003.

5. Thus, we clarify that Verizon DC has several choices at this juncture. It can: (1) implement the rates approved in Order No. 12610; (2) petition the Commission for new rates; or (3) request that the approved rates not be stayed? Inasmuch as the company has already filed an application for reconsideration, by operation of law, the applicable rates will be the rates that were in effect prior to the issuance of Order No. 12610.⁶ However, there is no law, rule, regulation, or policy under which Verizon DC may implement rates of its own choosing without Commission approval.⁷

6. As Verizon DC is aware, the Commission's consultative report, regarding the company's Section 271 application, is due to the FCC on January 9, 2003.⁸ Any attempt by Verizon DC to flout an Order of the Commission, either in whole or in part, may constitute sufficient reason to recommend to the FCC that the company's Section 271 application be denied.

THEREFORE, IT IS ORDERED THAT

7. Verizon DC is prohibited from using New York unbundled network element rates, or any other unbundled network element rates, unless this Commission has approved them.

A TRUE COPY:

BY DIRECTION OF THE COMMISSION:

CHIEF CLERK


SANFORD M. SPEIGHT
ACTING COMMISSION SECRETARY

^J D.C. Code, 2001 Ed. § 34-604(b) governs applications for reconsideration and provides for an automatic stay. Pursuant to this provision, the utility may request that the order not be stayed pending review of the application for reconsideration.

⁶ *Id.*

⁷ D.C. Code, § 34-601 prohibits a public utility from changing rates without the approval of the Commission,

⁸ See, *In the Matter of Application of Verizon Maryland, Inc., Verizon Washington DC, Inc., and Verizon West Virginia, Inc., et al. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Maryland, Washington, D.C. and West Virginia*, Public Notice, DA 02-3511, rel. December 19, 2002.

**PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA
1333 H STREET, N.W., SUITE 200, WEST TOWER
WASHINGTON, DC 20005**

DJSSENT OF COMMISSIONER ANYTHONY M. RACHAL III

Order No. 12626

January 6, 2003

**FORMAL CASE NO. 962, IN THE MATTER OF THE IMPLEMENTATION OF
THE DISTRICT OF COLUMBIA TELECOMUNICATIONS COMPETITION
ACT OF 1996 AND IMPLEMENTATION OF THE TELECOMMUNICATIONS
ACT OF 1996; FORMAL CASE NO. 1011 - IN THE MATTER OF VERIZON
WASHINGTON DC, INC.'S COMPLIANCE WITH THE CONDITIONS
ESTABLISHED IN SECTION 271 OF THE FEDERAL
TELECOMUNICATIONS ACT OF 1996, Order No. 12626**

I. BACKGROUND:

1. By this Order, the Public Service Commission of the District of Columbia ("Commission") attempts to clarify a representation made by Verizon Washington DC, Inc. ("Verizon DC") and its parent company, Verizon Communications, Inc. ("Verizon") in Verizon's Section 271 application¹ before the Federal Communications Commission ("FCC").² The majority opinion concludes that Verizon cannot use unbundled network element ("UNE") rates based on UNE rates from New York with adjustments for the District of Columbia ("New York adjustments") in lieu of either the rates established in this Commission's Order No. 12610³ or the rates effective prior to the issuance of that Order, as its UNE rates in its Section 271 application. For the following reasons, I must again dissent in this matter for the reasons set forth below:

¹ Under Section 271 of the Telecommunications Act of 1996, a regional bell operating company ("RBOC") may petition the FCC for permission to provide interLATA telecommunications services in each state. The RBOC will be granted that permission if it satisfies a 14-point checklist to demonstrate that its local exchange market is open to competition.

² *In the Matter of Application of Verizon Maryland, Inc., Verizon Washington DC, Inc., and Veriwn West Virginia, Inc., et al. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Maryland, Washington, D.C., and West Virginia*, WC Docket No. 02-384, filed December 19, 2002.

³ *Formal Case No. 962. In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996*, Order No. 12610, rel. December 6, 2002.

II. DISCUSSION

2. This Order is unnecessary in that Verizon-DC's Application for Partial Reconsideration and Clarification of Order No. 12610⁴ is pending before this Commission, and the basis for the issuance of this Order is pure speculation until this matter is formally considered by this Commission.

3. This Order has consumed valuable Commission resources and countless hours of staff time during the holiday period that might have been directed to other pending matters before this Commission.

4. This Order reflects badly upon the Commission, which has taken over two years to address this Section Number 271 proceeding, but in a matter of a month since the date of Order No. 12610, can expediently issue an Order to address a matter, which needs no clarification at this time.

5. Moreover, in light of Verizon-DC's Application for Reconsideration, the UNE rates established in Commission Order 12610 will be automatically stayed consistent with Commission regulations,⁵ pending the ultimate resolution of this matter.

6. Accordingly, the majority is correct in that this would reinstate the "proxy" UNE rates replaced by Order No. 12610. Verizon-DC has only indicated that it wishes to substitute the new New York rates as adjusted for the District of Columbia factors for the "proxy" UNE rates. This must be done by a request to this Commission. If not agreed to, this Commission can then enforce the utilization of the proper rates, should Verizon-DC proceed without appropriate authority.

7. Clearly, while the matter of permanent UNE rates is pending before this Commission, it is in the best interest of District ratepayers for this Commission to take up Verizon-DC's Application for Reconsideration on an expedited basis, by issuing an appropriate scheduling Order. This Commission should give serious consideration to Verizon-DC's proposal to charge lower interim UNE rates that conform to New York's TELRIC based UNE rates. As acknowledged by the parties, the alternative is to revert back to the higher non-TRILIC based "proxy" UNE rates that were in place in the District of Columbia prior to the issuance of Order No. 12610. This alternative would unnecessarily delay the introduction of lower UNE rates in the District of Columbia, and unduly burden Competitive Local Exchange Carriers and District ratepayers as a whole.

⁴ Formal Case No. 962, In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996. Verizon Washington, D.C. Inc.'s Application for Partial Reconsideration and Clarification of Order No. 12610, ("Verizon-DC's Application for Reconsideration", filed January 3, 2003).

⁵ D.C. Code, 2001 Ed. § 34-604(b).

III. THEREFORE:

8. This Order is premature and inappropriate at this time.
9. For the aforementioned reasons, I must dissent from the majority opinion regarding this matter.



962-T 691

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WILLIE L. LEFTWICH, P.C.
RETIRED

January 7, 2003

BY HAND

Sanford M. Speight, Esquire
Acting Secretary
The Public Service Commission
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Washington, D.C. 20005

03 JAN -7 PM 5:27
CHIEF CLERK
OFFICE OF THE
SECRETARY

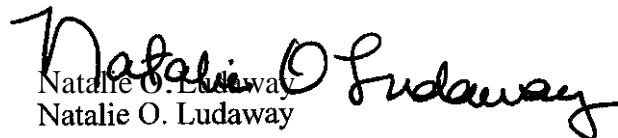
***Re: Formal Case No. 962 - Verizon Washington, DC Inc.'s Response in
Compliance with Order No. 12626***

Dear Mr. Speight:

Enclosed for filing are the original and fifteen (15) copies of Verizon Washington, DC Inc.'s Response in Compliance with Order No. 12626.

If you have any questions regarding this filing, please call me.

Respectfully,


Natalie O. Ludaway
Natalie O. Ludaway

Enclosure

cc: See Service List

BEFORE THE PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

IN THE MATTER OF THE IMPLEMENTATION)
OF THE DISTRICT OF COLUMBIA)
TELECOMMUNICATIONS COMPETITION)
ACT OF 1996 AND IMPLEMENTATION OF) Formal Case No. 962
THE TELECOMMUNICATIONS ACT OF 1996) and Formal Case No. 1011

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FILED

AM 8:00

VERIZON WASHINGTON, D.C. INC.'S RESPONSE IN COMPLIANCE WITH ORDER NO. 12626

On January 6, 2003, the Public Service Commission for the District of Columbia ("Commission") issued Order No. 12626 which ordered that "Verizon DC is prohibited from using New York unbundled network element rates, or any other unbundled network element rates, unless this Commission has approved them." Verizon DC wants to assure the Commission that it did not intend to charge any unbundled network element ("UNE") rates without the Commission's approval. Instead, any change in those rates proposed by Verizon DC would have to be accepted by a CLEC and incorporated into an interconnection agreement subject to the approval of the Commission.

Verizon DC regrets any confusion it may have caused about **this** process and therefore sets **forth** the following steps it has taken and will take to ensure that the Commission has the opportunity to approve any rates charged in the interim during the period the Commission's December 6, 2002, Order No. 12610 in Case 962 ("**Final Order**") is stayed:¹

¹ See Order No. 12626 at ¶ 7

² The **Final Order** is currently stayed by operation of law. Verizon DC filed its application for reconsideration on **January 3, 2003**. Under District law, that filing automatically stayed the **Final Order** See D.C. Code § 34-604(b).

1. On December 18, 2002, Verizon DC sent to all CLECs operating in the District the letter and proposed UNE Pricing List set forth in Attachment A.³ The December 18 CLEC Letter is an offer from Verizon DC to CLECs to amend existing CLEC interconnection agreements, pursuant to Section 252(a)(1) of the federal Telecommunications Act of 1996, which explicitly authorizes Verizon DC and CLECs to voluntarily enter into binding interconnection agreements, “which shall include a detailed schedule of itemized charges for interconnection and each service or network element.” Section 252(a)(1) also provides that any such voluntary agreement shall be “submitted to the State commission” for review and approval.
2. The offer in the December 18 CLEC Letter is explicitly limited to “any period starting on or after December 6, 2002, during which the rates in Order No. 12610 are not effective because that Order has been stayed.” The December 18 CLEC Letter also states that the offered interim stay rates will be replaced by final approved rates when the stay ends: “Upon termination of any such stay, the rates from Order No. 12610, or such other rates as might be ordered by the PSC or a reviewing court, shall go into effect.”
3. The December 18 CLEC Letter provides a mechanism for CLECs to accept the offered interim rates for application during a stay of the *Final Order*. For the convenience of the CLECs, they may signify their acceptance of Verizon DC’s Section 252 offer by “payment of your first invoice in which Verizon has applied the new rates to a period covered in whole or in **part** by a stay of Order No. 12610.” If a CLEC chooses instead to reject Verizon DC’s offer, it will contact Verizon DC, instead of paying the invoice with the interim stay rates on it. It is unlikely that a CLEC will reject the offer, since the offer reduces many rates from what would otherwise be in effect during the stay, and increases no rates.
4. When a CLEC accepts the Section 252 voluntary agreement offer in the December 18 CLEC Letter, that will “result in [the interim stay rates] being incorporated into your interconnection agreement *subject to Commission approval* for the duration of any stays(s) of Order No. 12610.” December 18 CLEC Letter (emphasis added). Thus the interim stay rates are not finally incorporated into a CLEC’s agreement until approved by the Commission.

³ See Verizon DC letter to CLECs with UNE Pricing List, Dec. 18, 2002 (Attachment A) (“December 18 CLEC Letter”).

5. The resulting interconnection agreement amendments will be filed with the Commission for its normal Section 252 review and approval, as required by Section 252(a)(1), (e)(1), and (e)(2)(A), and the Commission's rules for filing and review of interconnection agreements, 15 DCMR §§ 2600-2603 *et seq.* (2001). Upon Commission approval, the interim stay rate amendments will become binding on the parties.

Accordingly, by following the steps outlined above, Verizon DC is in compliance with the requirement of Order No. 12626 that no new rates go into effect “unless this Commission has approved them.” When these voluntary interconnection agreement amendments are filed with the Commission for review under Section 252(e), the Commission should approve them because they are in the public interest.

In the absence of interim stay rates, like those offered in the December 18 CLEC Letter, the stay of the *Final Order* would put back into effect for the duration of the stay the “proxy” UNE rates used in the District before the *Final Order*. Neither the Commission nor the FCC has ever found these prior “proxy” rates to comply with TELRIC.

By contrast, the interim stay rates offered in the December 18 CLEC Letter do comply with TELRIC – because they are set to “benchmark” to FCC-approved New York TELRIC rates, unless a lower rate was available from the District's prior “proxy” rates. The interim stay rates in the December 18 CLEC Letter were chosen by selecting for each UNE rate, the *lower* of (1) the “proxy” rate that was in effect in the District before the *Final Order*, or (2) the equivalent UNE rate in New York, adjusted wherever possible to reflect cost differences between the District and New York, using the FCC's “benchmarking” process. Thus, none of the offered interim stay rates are higher than the

prior “proxy” rates, and the only “proxy” rates that remain are those that are equal to *or lower than* a rate benchmarked to the New York UNE rates.

Use of “benchmarked” rates for this purpose is appropriate because the FCC has repeatedly approved the use of rates “benchmarked” to the New York rates as appropriate TELRIC-compliant rates in other jurisdictions.⁴ The FCC’s benchmark process starts with approved TELRIC-compliant New York rates, but adjusts them to reflect cost differences between the jurisdictions, as reflected in the FCC’s Synthesis Cost Model.’ As indicated, this process is not unique to the District and has been used in a number of other states.

Verizon DC’s use of “benchmarked” TELRIC rates as interim stay rates is also consistent with the Commission’s conclusion that Verizon DC has met the requirements of Section 271 of the federal Telecommunications Act of 1996, and that the Commission supports Verizon DC’s application to provide long distance service to residents of the District.⁶ TELRIC-compliant rates are required for a successful Section 271 application at the FCC – even in the interim while the rates set in the *Find Order* are stayed. But the prior “proxy” rates have not been found to comply with TELRIC, and therefore must be adjusted to ensure that they pass the FCC’s benchmark test, as Verizon DC has done in the interim stay rates it has offered to the CLECs. Therefore, the rates offered in the

⁴ See *Virginia §271 Order* ¶¶ 124, 126-129 (“Verizon’s use of [benchmarked rates from New York] produced rates that are within the range that a reasonable application of TELRIC principles would produce.”); see also *Arkansas/Missouri §271 Order* ¶ 75; *Rhode Island § 271 Order* ¶ 55; *Massachusetts § 271 Order* ¶¶ 22-25.

⁵ See *Virginia §271 Order* ¶¶ 91-92

⁶ See *In the Matter of Verizon Washington, DC Inc.’s Compliance with the Conditions Established in Section 271 of the Federal Telecommunications Act of 1996*, Letter from the District of Columbia Public Service Commission to the Federal Communications Commission, dated Dec. 19, 2002.

WHEREFORE, Verizon DC respectfully submits this response in compliance with Order No. 12626.

Respectfully submitted,

VERIZON WASHINGTON, DC INC.

Handwritten signature of David A. Hill in black ink.

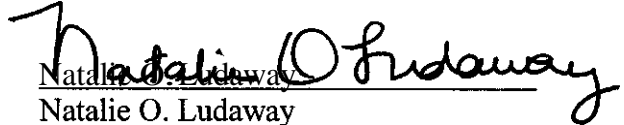
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January 7, 2003

CERTIFICATE OF SERVICE

I certify that on this 1 day of January, 2003, copies of Verizon Washington, DC Inc.'s Response in Compliance with Order No. 12626 were hand delivered to those indicated by [*] and mailed first class, postage prepaid, to all parties as indicated below.


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Natalie O. Ludaway

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ATTACHMENT A

December 18, 2002

Subject: VEFUZON WASHINGTON, **DC**: UNE Rates for Existing Interconnection Agreements

To: UNE CLEC Customers - Verizon Washington, DC

On December 6, 2002, the Public Service Commission of the District of Columbia issued Order No. 12610 in Formal Case No. 962, which ordered new rates for UNE products and services in Washington, D.C., effective immediately. Order No. 12610 is potentially subject to motions for reconsideration and/or judicial review, either of which might result in a stay of that Order for some period of time pending completion of reconsideration and/or review. In the event of such a stay, Verizon will offer revised rates.

A complete list of UNE products and services, and the associated revised rates, are provided in the Pricing List attached to this letter. **An** asterisk (*) identifies the rates that differ from those in effect before December 6, 2002. The rates in the attached Pricing List will become effective for any period starting on or after December 6, 2002, during which the rates in Order No. 12610 are not effective because that Order has been stayed. Upon termination of any such stay, the rates from Order No. 12610, or such other rates as might be ordered by the PSC or a reviewing **court**, shall go into effect.

Following your receipt of this notification, your payment of your first invoice in which Verizon has applied the new rates to a period covered in whole or in part by a stay **of** Order No. 12610 will signify your acceptance of these rates and will result in them being incorporated into your interconnection agreement subject to Commission approval for the duration of any stay(s) **of** Order No. 12610.

It is possible that the new UNE Pricing List will contain rates and/or charges for UNE products/services to which you are not entitled under the terms **of** your specific interconnection agreement with Verizon. The existence of such rates and/or prices in the new UNE Pricing List shall not be construed as an agreement by Verizon to provide you with any UNE other ~~than~~ those expressly provided for by the terms of your agreement. If your agreement with Verizon does not include terms providing a specific UNE product or service that Verizon is required by applicable law to provide you, you may contact your Verizon Account Manager to arrange for an appropriate amendment to your agreement.

**District of Columbia
Recurring UNE Rates**

UNBUNDLED NETWORK ELEMENTS	DC Rates in Event of Stay of PSC 12/06 Order
UNBUNDLED LOOP - per month	
2 Wire Basic Loop	\$ 8.49
Off-Premise Extension (same as 2 Wire LOOP)	\$ 8.49
2 Wire Customer Specified Signalling Loop	\$ 10.52
4 Wire/4 Wire Customer Specified Signalling Loop	\$ 19.97
ISDN-BRI LOOP	\$ 12.36
Digital 4 wire (56KD/64KD) Loop	\$ 19.97
DS1/ISDN-FRI LOOP	\$ 72.65
DS3 LOOP	\$ 593.30
UNBUNDLED SUBLOOP ARRANGEMENTS - per month	
Subloop - Distribution	
2 wire	\$ 3.87
4 wire	\$ 6.36
Subloop - Feeder	
2 Wire	\$ 6.22
ISDN (2 wire Digital)	\$ 9.53
4 Wire	\$ 16.34
DDS (4 wire Digital)	\$ 16.34
DS1	\$ 69.95
DS3	\$ 438.22
UNBUNDLED NETWORK INTERFACE DEVICE (NID)	
NID to NID Connection (per NID)	
2 wire	\$ 1.01
4 wire	\$ 1.01
UNE Shared NID (per line)	\$ 0.39
Standalone NID (per NID)	
2 Wire	\$ 1.01
4 Wire	\$ 1.01
DS1	\$ 4.49
Unbundled xDSL Conditioning & Qualification	
Mechanized Loop Qualification	\$ 0.49
Wideband Test Access	\$ 1.72
Non-Recurring	
Addition of Loop Electronics - Normal	\$ 938.26
Addition of Loop Electronics - Expedite	\$ 946.08
Unbundled EEL Testing	
2 wire Analog Test Charge	\$ 0.43
2 Wire Digital Test Charge	\$ 0.66
4 Wire Analog Test Charge	\$ 1.08
DS1 (1.544 mbps) Test Charge	\$ 4.17
Digital 4 Wire (56 or 64 kbps) Test Charge	\$ 1.08
House and Riser	
Cable Investment per floor	\$ 0.01
Building Access per pair	\$ 0.58
Non-Recurring	
50 Pair Terminal Charge	\$ 262.00

**District of Columbia
Recurring UNE Rates**

UNBUNDLED NETWORK ELEMENTS	DC Rates in Event of Stay in Effect 12/06 Order
Unbundled EEL IOF Voice Grade Fixed includes both ends Voice Grade per Mile	\$ 28.08 \$ 0.02
Line Sharing/Line Splitting Admin & Support Option A Option C Non-Recurring Splitter Installation Splitter Equipment - Option C only	\$ 36.17 \$ 36.17 \$ 1,287.36 \$ 4.78
Line Sharing and Line Splitting - OSS (Line Sharing & Subloop OSS)	\$ - \$ -
Unbundled Individual Line Port Features	
Res/Bus Features	
Three Way Calling Return Call Calling Number Delivery Calling Name and Number Delivery Anonymous Call Rejection Call Waiting Display (Name and Number) Remote Call Forwarding Repeat Call Call Waiting PBX per MOU Multi-Line Hunting per MOU	\$ 0.003752 \$ 0.000002
Centrex Features	
Ctx Three-way Calling Ctx Six-Way Conference Ctx SMDR to Premise Ctx Repeat Call Ctx Distinctive Ringing Centrex Intercom Ctx Loudspeaker Paging Ctx Meet Me Conference Ctx Announcement Call Transfer-All Calls Call Waning Terminating (All Calls) Directed Call Pickup with Barge-In (Originating) Executive Busy Override Ctx Automatic Recall (Return Call) UCD per MOU Hunting per MOU Queuing per MOU Intercom & Features per MOU Attendant per MOU Attendant Console per MOU Centralized Attendant Services per MOU Attendant Access Code Dialing per MOU	\$ 0.000005 \$ 0.000004 \$ 0.000968 \$ 0.032910 \$ 0.04952 \$ 0.036556 \$ 0.353835 \$ 0.075992

**District of Columbia
Recurring UNE Rates**

UNBUNDLED NETWORK ELEMENTS	DC Rates in Event of Stay of RSC 12/06 Order
Automatic Route Selection per MOU	\$ 0.000838
Electronic Tandem Switching per MOU	\$ 0.001947
ISDN Features	
ISDN Intercom	
ISDN Announcement	
ISDN Six-Way Conference	
ISDN Three-way Calling	
ISDN Call Pickup	
ISDN Selective Call Rejection	
Calling Name and Number Delivery	
ISDN Call Transfer Individual- All Calls (Ftr. 578)	
ISDN Centrex Features	\$ 0.010160
Unbundled Line Ports -per month	
POTS/PBX/CTX/UPALP Port (NY UNE-P associated rate)	\$ 1.55
ISDN PRI Port	\$ 161.19
ISDN Single line BRI or ISDN Centrex Port	\$ 7.58
Direct Inward Dialing (DID) Port	\$ 3.50
Automatic Identified Outward Dialing (AIOD) Port	\$ 3.50
Unbundled Coin Port (UCP)	\$ 2.62
Simplified Message Desk Interface (SMDI) Port	\$ 267.34
Switched DS1 Port	\$ 139.26
IDLC Port	\$ 335.54
Unbundled Trunk Ports	
Dedicated Trunk Port - End Office (per month)	\$ 67.96
Dedicated Trunk Port - Tandem (per month)	\$ 67.96
Dedicated Trunk Port - TOPS (per month)	\$ 34.56
Common Trunk Port - End Office (per mou)	Incl. In switching rates
Common Trunk Port - Tandem (per mou)	
Common Trunk Port - TOPS (per mou)	
Unbundled Switching -Per MOU	
Originating EO Local Switching per MOU	\$ 0.003000
Terminating EO Local Switching per MOU	\$ 0.003000
ISDN Originating Digital Switched Voice per MOU	\$ 0.005758
ISDN Terminating Digital Switched Voice per MOU	\$ 0.002669
ISDN Originating Digital Circuit Switched Data per MOU	\$ 0.003203
ISDN Terminating Digital Circuit Switched Data per MOU	\$ 0.002669
Unbundled Tandem Switching	
Tandem Switching MOU	\$ 0.00253}
Common Transport - per MOU	
Fixed	\$ 0.000401
Per Mile	\$ 0.000001
Recip Comp	
Terminating End Office Switch Usage (per MOU)	\$ 0.003000
Terminating Tandem Switch Usage (per MOU)	\$ 0.005000

**District of Columbia
Recurring UNE Rates**

UNBUNDLED NETWORK ELEMENTS	DC Rates in Event of Stay of PSC 12/06 Order
Unbundled Dedicated Transport - per Month	
Entrance Facilities (For NY. add 4 quarter mile charges to the fixed rt)	
DS-1 Entrance Facility	\$ 102.75
DS-3 Entrance Facility	\$ 827.27
STS-1 Entrance Facility	\$ 278.83
OC-3 Entrance Facility	\$ 903.43
OC-12 Entrance Facility	\$ 2,749.84
Interoffice Facilities (IOF)	
DS-3 Fixed includes both ends	\$ 711.09
DS-3 per Mile	\$ 15.21
DS-1 Fixed includes both ends	\$ 54.00
DS-1 per Mile	\$ 2.05
OC-3 - Fixed includes both ends	\$ 2,061.50
OC-3 - per mile	\$ 31.45
OC-12 - Fixed includes both ends	\$ 3,333.63
OC-12 - per mile	\$ 89.82
STS-1 - Fixed includes both ends	\$ 674.62
STS-1 - per mile	\$ 10.42
STP Port Termination (Monthly)	\$ 305.88
S\$7 Link (per mile)	\$ 0.08
Unbundled Signalling Databases	
800 Database	
basic query	\$ 0.000133
vertical query	\$ 0.000540
LIDB (Per Query)	
Calling Card	\$ 0.000094
Billed Number Screening	\$ 0.000094
DARK FIBER - IOF	
Verizon CO to Verizon CO	
Serving Wire Center Charge/SWC/Pair	\$ 8.01
Per Mile	\$ 118.51
Verizon CO to CLEC CO	
Serving Wire Center Charge/SWC/Pair	\$ 8.01
Channel Termination Charge/CLEC CO	\$ 60.31
DARK FIBER - LOOP	
Serving Wire Center Charge/SWC/Pair	\$ 8.01
Loop Charge/Pair	\$ 60.31
Customized Routing (per line per month)	\$ 0.00235
Daily Usage File	
Per Record Recorded	0.0002810
Per Record Transmitted	0.000101
Per Media (Tape or Cartridge)	20.32
SMS Pricing (AIN Service Creation)	
Service Creation Usage	

**District of Columbia
Recurring UNE Rates**

UNBUNDLED NETWORK ELEMENTS	DO Rates in Event of Stay of RSO 12/06 Order
Remote Access per 24 Hr. day	\$ 727.83
On Premise per 24 Hr. day	\$ 727.83
Certification and Testing per Hour	\$ 70.12
Help Desk Support per Hour	\$ 72.96
Service Charges	
Subscription Charges	\$ 0.22
Database Queries	
Network Query	\$ 0.000954
CLEC Network Query	\$ 0.000954
CLEC Switch Query	\$ 0.000954
Utilization Element	
Service Modification	
DTMF Update Per Change	\$ 0.15000
Service Order Input	
Switched Based Announcement	
Developmental Charges	
Service Creation Access Ports per month	\$ 134.47
Operations Support Systems (per month/px line)	
Ongoing and Recovery of one time expense (during 10 yr. Period)	\$
Ongoing only (after 10 yr. Period)	\$ -